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Attorneys for plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

5987 STONE HOLLOW AVENUE TRUST

Plaintiff,

vs.

WELLS FARGO BANK as successor in interest
to WASHINGTON MUTUAL BANK; MTC
FINANCIAL dba TRUSTEE CORPS;
NORMAN MALLILLIN; and NANCY
MALLILLIN

Defendants.

CASE NO.: 2:13-cv-00629

MOTION TO EXTEND TIME TO FILE DISPOSITIVE MOTIONS

Plaintiff, 5987 Stone Hollow Avenue Trust, by and through its attorney, Michael F. Bohn, Esq., move this court to extend the date for the plaintiff to file a motion for summary judgment. This motion is based on the declaration of counsel.

DATED this 30th day of March 30, 2016

LAW OFFICES OF
MICHAEL F. BOHN, ESQ., LTD.

By: /s/ Michael F. Bohn, Esq. ./.
Michael F. Bohn, Esq.
376 East Warm Springs Road, Suite 140
Las Vegas, Nevada 89119
Attorney for plaintiff

DECLARATION OF MICHAEL F. BOHN, ESQ.

MICHAEL F. BOHN, ESQ. states:

1. Declarant is the attorney for plaintiff in this case and makes this declaration based upon personal knowledge.

2. This case is a quiet title action after an HOA foreclosure sale in which the plaintiff has alleged that the foreclosure sale has extinguished the deed of trust held by the defendant bank.

3. The deadline for filing the dispositive motion was March 10, 2016.

4. As a result of a calendaring error in my office, the plaintiff did not timely file a motion for summary judgment.

5. I take full responsibility for this calendaring error.

6. The defendant did timely file a motion for summary judgment. Because these cases are so common, and because the issues presented in this case are not unique, there is a reasonable likelihood that this case can be resolved on a summary judgment motion, if the plaintiff would be permitted to file the motion. This would save judicial resources.

7. The plaintiff can get it's motion on file by 5:00 p.m. the day after this court enters the order permitting the late filing.

8. If called upon to testify to the above facts, declarant could do so competently.

9. I declare under penalties of perjury under the laws of the State of Nevada that the foregoing is true and correct.

DATED this 30th day of March, 2016

/s// Michael F. Bohn, Esq./
MICHAEL F. BOHN, ESQ. .
Attorney for plaintiff

IT IS SO ORDERED:



RICHARD F. BOULWARE, II
United States District Judge

DATED this 27th day of April, 2016.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 30th day of March 2016, I electronically transmitted the above **MOTION TO EXTEND TIME TO THE Clerk'S Office** using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all counsel in this matter; all counsel being registered to receive Electronic.

/s/ Marc Sameroff/
An Employee of the LAW OFFICES OF
MICHAEL F. BOHN, ESQ., LTD.